

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WILBERT NAPOLEON, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Case No.: 2:24-CV-00186-BJR

**STIPULATED MOTION TO EXTEND  
DEADLINES AND ORDER**

**STIPULATED MOTION**

Plaintiff Wilbert Napoleon and Defendant Amazon.com, Inc. hereby stipulate to extend the deadlines to respond to the Complaint and initial discovery deadlines.

On February 9, 2024, Plaintiff filed his putative Class Action Complaint. Dkt. No. 1. On February 15, 2024, Plaintiff served Defendant with the Complaint. Dkt. No. 16. On February 28, 2024, pursuant to the parties' stipulated motion to extend deadlines to amend and respond to Complaint, the Court extended the time for Amazon to answer or otherwise respond to the Complaint to March 28, 2024. Dkt. No. 18.

On March 12, 2024 and March 20, 2024, Amazon filed notices of related cases in this action with respect to *Natalie Gianne et al. v. Amazon.com, Inc.*, Case No. 2:24-cv-00309-RSM, assigned to the Honorable Ricardo S. Martinez, and *Timothy Peterson et al. v. Amazon.com, Inc.*, Case No. 2:24-cv-00364-JHC, assigned to the Honorable John H. Chun. Dkt. Nos. 23 and 26.

On March 22, 2024, pursuant to the parties stipulated motion to extend deadlines, the Court extended Amazon's deadline to respond to the Complaint, Plaintiff's deadline to amend the Complaint, and the initial discovery deadlines. Dkt. No. 27.

Since then, Plaintiff's counsel has informed Amazon that they are conferring with plaintiffs' counsel in the *Gianne* and *Peterson* cases regarding potential consolidation of those actions with this action. In light of the parties' ongoing conferral regarding consolidation, the parties agree and respectfully request that the Court extend the following deadlines for good cause:

Deadline for Rule 26(f) Conference	May 22, 2024
Deadline for Amazon to Respond to the Complaint	May 29, 2024
Deadline for Plaintiff to Amend Complaint, under Fed. R. Civ. P 15(a)	Either May 29, 2024; or 21 days after service of Amazon's responsive pleading or 21 days after service of Amazon's motion under Rule 12(b), (e), or (f), whichever is earlier
Initial Disclosures Pursuant to Rule 26(a)(1)	May 29, 2024
Combined Joint Status Report and Discovery Plan as Required by Rule 26(f) and Local Civil Rule 26(f)	June 5, 2024

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the parties, and respectfully submitted for the Court's approval, that the above deadlines be reset as requested.

Dated: April 4, 2024

Respectfully submitted,

FENWICK & WEST LLP

By: /s/ Brian D. Buckley

Brian D. Buckley, WSBA No. 26423  
401 Union Street, 5th Floor  
Seattle, WA 98101  
Telephone: 206.389.4510  
Email: bbuckley@fenwick.com  
*Attorneys for Defendant Amazon.com, Inc.*

DOVEL & LUNER, LLP

By: /s/ Jonas B. Jacobson  
Jonas B. Jacobson (*pro hac vice*)

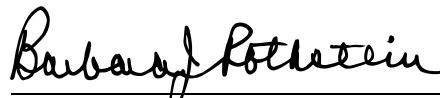
Christin Cho (*pro hac vice*)  
Simon Franzini (*pro hac vice*)  
201 Santa Monica Blvd., Suite 600  
Santa Monica, California 90401  
Telephone: (310) 656-7066  
Facsimile: (310) 656-7069  
Email: jonas@dovel.com  
Email: christin@dovel.com  
Email: simon@dovel.com

CARSON & NOEL PLLC  
Wright A. Noel, WSBA No. 25264  
20 Sixth Ave. NE  
Issaquah WA 98027  
Tel: 425-395-7786  
Fax: 425-837-5396  
Email: wright@carsonnoel.com

*Attorneys for Plaintiff Wilbert Napoleon*

**IT IS SO ORDERED.**

DATED this 9th day of April, 2024.

  
Barbara Jacobs Rothstein  
U.S. District Court Judge

Presented by:  
FENWICK & WEST LLP

By: /s/ Brian D. Buckley  
Brian D. Buckley, WSBA No. 26423

401 Union Street, 5th Floor  
Seattle, WA 98101  
Telephone: 206.389.4510  
Facsimile: 206.389.4511  
Email: bbuckley@fenwick.com  
*Attorneys for Amazon.com, Inc.*